

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Civil No. 13-cv-13809

Honorable Robert H. Cleland

Mag. Judge David R. Grand

vs.

ONE HUNDRED SIXTY THOUSAND
SIX HUNDRED FORTY-SIX DOLLARS
AND SEVENTY-SEVEN CENTS
(\$160,646.77) IN U.S. CURRENCY
FROM COMERICA BANK ACCOUNT
NO. 1852840618

Defendant *in Rem*.

CLAIM CONTESTING FORFEITURE

***Claimant: Ali Hamood Hasan on behalf of
Ibnaalhami Services, Inc., Case No: 13-civ-13809***

NOW COMES, Claimant, Ali Hamood Hasan on behalf of
Ibnaalhami Services, Inc., by and through its attorney, AYAD LAW,
P.L.L.C., states the following as its Claim Contesting Forfeiture:

Claimant, a victim and lawful owner of Ibnaalhami Services Inc., is
contesting the forfeiture of the account and monies seized in connection with
the above referenced civil proceeding from his business account totaling one

hundred sixty thousand six hundred forty-six dollars and seventy-seven cents (\$160,646.77), from the **Comerica Bank Account, Account Number 1852840618 held in Detroit MI.**

By way of background, the monies were seized pursuant to a Complaint and Warrant of Arrest and Notice *In Rem* by the Court on September 18, 2013 in connection to the alleged activity of the Defendant named in the Civil Complaint. **However, Claimant operates a legitimate travel agency. A substantial portion of these funds are personal to Mr. Hasan or are related to the regular course of business of his travel agency. Thus, Mr. Hasan is a victim whose business funds have been seized unlawfully. The property in question was not substantially “involved in a transaction or attempted transaction in violation of section 1956, 1957, or 1960...or any property traceable to such property.” 18 U.S.C. 981(a)(1)(A).**

As such, the **claimant respectfully requests that the account and funds be released to him on account of hardship and innocent owner defense, pursuant to 18 U.S.C. 983 9(d).** Due to the financial constraint that the seizure has imposed on the claimant who is a victim and lawful owner of the account, he still must furnish the travel related business without

the benefit of the monies seized for said travel expenses to customers or for uses of his personal funds.

REQUEST TO PARDON THE PROPERTY

The claimant requests that the **account and monies be pardoned** as it was acquired through the ordinary course of his business and not for any illegal purpose, and further prays that the property is **granted remission of the forfeiture and/or in the alternative mitigation**. This request is warranted as the claimant has further established that he has a good faith, and legal cognizable interest in the seized property as the owner of the business account, and substantial monies were deposited into his account for both business and personal purposes.

Respectfully Submitted,

AYAD LAW, P.L.L.C.

/s/ Nabih H. Ayad

Nabih H. Ayad (P-59518)

Attorney for Claimant
2200 North Canton Center Road, Suite 220
Canton, Michigan 48187
(734) 983-0500

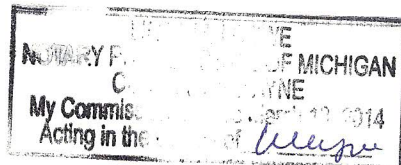
Dated: October 23, 2013

VERIFICATION

I, *Ali Hasan*, on behalf of myself and Ibnalhalmi Services, Inc., hereby swear under oath, subject to penalty of perjury, pursuant to Rule G of the Forfeiture Actions in Rem, that I have read the entire petition and I am in agreement to its contents in its entirety and that it is my understanding and knowledge to the best of my recollection that all information contained therein is true and accurate.

Dated: 10.23.13 *Ali Hasan*
ALI HASAN

STATE OF MICHIGAN)
COUNTY OF WAYNE)



Subscribed and Sworn to before me

Jim McLeese,
Notary Public, County of Wayne

This 23rd, Day of October, 2013

My commission expires
3-13-2014

CERTIFICATE OF SERVICE

I hereby certify that on October 23, 2013 I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, which will send notification of such filing to the following:

JONATHAN GREY

jonathan.grey@usdoj.gov

I further certify that I have mailed by U.S. mail the paper to the following non-ECF participants:

None.

/s/ Nabih H. Ayad

Nabih H. Ayad (P-59518)
AYAD LAW, P.L.L.C.
Attorney for Claimant
2200 Canton Center Rd., Suite 220
Canton, MI 48187
Phone: [734-983-0500](tel:734-983-0500)
Fax: [734-983-0520](tel:734-983-0520)
Email: nayad@ayadlaw.com